

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHRIS DEMARINIS, individually)	
and as guardian of D.D.,)	
)	
Plaintiff,)	Civil Action No.: 3:20-cv-00713-
)	RDM
v.)	
)	
ANTHEM INSURANCE COMPANIES,)	Honorable Robert D. Mariani
INC. d/b/a ANTHEM BLUE CROSS)	
AND BLUE SHIELD, et al.,)	
)	
Defendants.)	

DECLARATION OF JORDAN FONTENOT

I, Jordan Fontenot, declare and state as follows:

1. I am an attorney licensed by the Supreme Court of Texas to practice law in Texas. I am an associate attorney with the law firm of Reed Smith LLP, which is counsel of record for Defendant Anthem Insurance Companies, Inc. d/b/a Anthem Blue Cross and Blue Shield (“Anthem”) in the above-captioned action. That said, I personally have not filed an appearance as counsel of record in this action.

2. I am over twenty-one years of age, of sound mind, and I am physically and mentally competent to testify to the matters herein. Each of the following facts and statements are true and correct and are either within my personal knowledge or based on my personal review of documents and data as set forth below. I could and

would testify to the facts and statements if called as a witness to offer live testimony in this matter, to the extent that testifying would not infringe on the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

3. I submit this Declaration in further support of Defendant's Brief in Opposition (the "Opposition") of Plaintiff's Motion for an Award of Attorney's Fees and Costs (the "Motion") in this action.

4. Attached hereto as **Exhibit A** is a true and correct copy of information that pertains to time entries that were recorded on Exhibit A to Plaintiff's Motion, which is ECF No. 63-2. More specifically, colleagues at Reed Smith reviewed Exhibit A to Plaintiff's Motion and converted salient information about counsel's time entries into Microsoft Excel format. Such salient information about the time entries in question included the applicable date, hourly rate, hours worked, timekeeper, hours billed, and description. My colleagues then converted the Excel information into PDF format. Notably, the "Advances" and "Recap" sections of Plaintiff's Exhibit A, which appear on page 14 of 29 of that Exhibit, were omitted from Anthem's Exhibit A. The "Advances" section pertains to costs of local counsel, while the "Recap" section pertains to totals of various costs and expenses reflected on Plaintiff's Exhibit A.

5. Further, I have reviewed Exhibit A to Plaintiff's Motion against the attached Exhibit A. Based on my review and comparison of these documents, my colleagues' work appears to have been accurately completed.

6. Attached hereto as **Exhibit B** is a true and correct copy of information that reflects the time entries from (Anthem's) Exhibit A that are disputed by Anthem in its Opposition, along with Anthem's corresponding objection to such time entries.

7. In preparing Exhibit B, I took the information in (Anthem's) Exhibit A and added Column N and included information in Column N about the specific objections Anthem is asserting. Further, I added the words "Total of Column K" and "\$14,849.00" which appear at the end of Columns J and K, in order to assist the Court in understanding the value of disputed time entries in total.

8. In addition, on pages 17 through 19 of Anthem's Opposition, there are several instances where the totals of the value of entries falling into a specific category of objection are identified (*e.g.*, \$12,976.50 for vague entries). I personally calculated these totals based on the information from (Anthem's) Exhibit B utilizing Excel formulas. To the best of my knowledge, these totals were accurately calculated by me. Notably, as mentioned in Anthem's Opposition, some entries and fees are subject to multiple objections.

9. Finally, colleagues at Reed Smith converted the information in Exhibit B into PDF format. Based on my review and comparison of the PDF copy of Exhibit

B, the information in the prior Excel version of Exhibit B, and Anthem's Exhibit A, the work of my colleagues appear to have been accurately completed.

10. The duties of my colleagues at Reed Smith who performed work on the above-referenced Exhibits regularly includes assignments like those described in this Declaration.

11. I declare under penalty of perjury under the laws of the United States of America that that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on the 21st day of May 2024.

/s/ Jordan Fontenot

Jordan Fontenot

EXHIBIT A

Date	Tkpr	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
11/18/2019	19	ACM	10	16	219	605	0.10	0.10	60.50		Internal collaboration re strategy with Leily.
12/9/2019	19	ACM	10	16	192	605	0.20	0.20	121.00		Internal collaboration re strategy with LS.
3/4/2020	19	ACM	10	13	26	535	4.00	4.00	2140.00		Review documents to draft Complaint.
3/16/2020	19	ACM	10	16	193	605	0.20	0.20	121.00		Internal collaboration re strategy with LS.
3/17/2020	19	ACM	10	16	194	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
3/20/2020	19	ACM	10	13	34	535	3.50	3.50	1872.50		Review documents and Amended Complaint.
3/20/2020	19	ACM	10	13	35	535	3.50	3.50	1872.50		Review documents and Amended Complaint.
4/3/2020	19	ACM	10	13	49	535	1.50	1.50	802.50		Review Motion to Dismiss.
4/3/2020	19	ACM	10	13	58	535	1.50	1.50	802.50		Review Motion to Dismiss.
4/3/2020	19	ACM	10	16	195	605	0.20	0.20	121.00		Internal collaboration re strategy with LS.
4/3/2020	19	ACM	10	13	221	605	1.00	1.00	605.00		Review Motion to Dismiss.
4/6/2020	19	ACM	10	16	217	605	0.10	0.10	60.50		Internal collaboration re strategy with Leily S.
4/7/2020	19	ACM	10	16	218	605	0.10	0.10	60.50		Internal collaboration re strategy with Leily S.
4/8/2020	19	ACM	10	16	196	605	0.20	0.20	121.00		Internal collaboration re strategy with LS.
4/8/2020	19	ACM	10	16	197	605	0.20	0.20	121.00		Internal collaboration re strategy with LS.
4/8/2020	19	ACM	10	13	220	605	1.00	1.00	605.00		Review and revise Complaint and Stipulation.
4/13/2020	19	ACM	10	13	59	535	3.50	3.50	1872.50		Review documents.
4/16/2020	19	ACM	10	16	198	605	0.30	0.30	181.50		Internal collaboration re strategy. Emails with LS and local counsel.
4/20/2020	19	ACM	10	13	222	605	0.50	0.50	302.50		Review Motion to Seal.
4/21/2020	19	ACM	10	16	199	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
5/1/2020	19	ACM	10	13	71	535	3.50	3.50	1872.50		Draft Complaint. Correspondence with court.
7/5/2020	19	ACM	10	16	201	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
7/14/2020	19	ACM	10	16	200	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
8/10/2020	19	ACM	10	16	202	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
10/6/2020	19	ACM	10	16	203	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
10/28/2020	19	ACM	10	13	223	605	0.30	0.30	181.50		Review Joint Case Management Report. Internal collaboration with LS.
11/12/2020	19	ACM	10	16	204	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
1/8/2021	19	ACM	10	16	206	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
2/5/2021	19	ACM	10	16	207	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
3/16/2021	19	ACM	10	13	208	605	3.50	3.50	2117.50		Review and revise reply brief.
3/25/2021	19	ACM	10	16	205	605	0.10	0.10	60.50		Internal collaboration re strategy with LS.
3/25/2021	19	ACM	10	13	209	605	3.50	3.50	2117.50		Review and revise Brief Summary Judgment.
5/13/2021	19	ACM	10	16	211	605	0.10	0.10	60.50		Internal collaboration re strategy with Leily.
5/18/2021	19	ACM	10	13	171	550	2.50	2.50	1375.00		Review pleadings.
5/24/2021	19	ACM	10	16	212	605	0.10	0.10	60.50		Internal collaboration re strategy with Leily.

Date	Tkpr		Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
5/25/2021	19	ACM	10	13	210	605	3.50	3.50		2117.50		Review and revise Brief in Opposition to Summary Judgment.
6/1/2021	19	ACM	10	16	213	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.
8/4/2021	19	ACM	10	16	214	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.
1/7/2022	19	ACM	10	16	215	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily S.
4/10/2022	19	ACM	10	16	216	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.
Billable Total:			19	Alan C. Milstein			40.00	40.00		22,592.50		
11/18/2019	56	LS	10	65	18	305	0.10	0.10		30.50		Correspondence/Phone Calls with Local Counsel
11/18/2019	56	LS	10	16	19	305	0.10	0.10		30.50		Internal collaboration re strategy with ACM
11/27/2019	56	LS	10	42	1	305	1.00	1.00		305.00		Review of Documents from client
12/4/2019	56	LS	10	42	2	305	1.00	1.00		305.00		Review of Documents
12/4/2019	56	LS	10	315	3	305	0.10	0.10		30.50		Send e-mail to client, additional info needed
12/4/2019	56	LS	10	45	4	305	2.00	2.00		610.00		Drafting-Complaint
12/5/2019	56	LS	10	316	5	305	0.10	0.10		30.50		E-mails to and from Client.
12/5/2019	56	LS	10	42	6	305	0.10	0.10		30.50		Review of Documents from client
12/9/2019	56	LS	10	11	7	305	0.50	0.50		152.50		Research Athem BCBS/Carefirst/Siemens
12/9/2019	56	LS	10	315	8	305	0.10	0.10		30.50		Send e-mail to client
12/9/2019	56	LS	10	16	9	305	0.20	0.20		61.00		Internal collaboration re strategy w/ACM
12/9/2019	56	LS	10	45	10	305	1.00	1.00		305.00		Drafting-Complaint
12/13/2019	56	LS	10	316	11	305	0.10	0.10		30.50		E-mails to and from Client.
12/16/2019	56	LS	10	43	12	305	0.20	0.20		61.00		Review & Revise complaint
12/16/2019	56	LS	10	65	13	305	0.30	0.30		91.50		Correspondence/Phone Calls' e-mail w/local counsel
12/16/2019	56	LS	10	65	14	305	0.20	0.20		61.00		Correspondence/Phone Calls, pro hac vice information
12/18/2019	56	LS	10	53	15	305	0.10	0.10		30.50		Review of correspondence, Settlement Denial HR
12/30/2019	56	LS	10	65	16	305	0.10	0.10		30.50		Correspondence/Phone Calls, e-mail w/local counsel
12/30/2019	56	LS	10	65	17	305	0.10	0.10		30.50		Correspondence/Phone Calls, agmt. From local counsel
1/15/2020	56	LS	10	65	20	305	0.10	0.10		30.50		Correspondence/Phone Calls, e-mail w/local counsel re: status
1/21/2020	56	LS	10	65	21	305	0.10	0.10		30.50		Correspondence/Phone Calls, e-mail w/local counsel
2/5/2020	56	LS	10	316	22	325	0.20	0.20		65.00		E-mails to and from Client., Status
2/5/2020	56	LS	10	65	23	325	0.20	0.20		65.00		Correspondence/Phone Calls, e-mail w/local counsel
3/2/2020	56	LS	10	316	24	325	0.20	0.20		65.00		E-mails to and from Client.
3/2/2020	56	LS	10	65	25	325	0.10	0.10		32.50		Correspondence/Phone Calls; E-mail def.
3/16/2020	56	LS	10	45	27	325	1.00	1.00		325.00		Drafting-Amended Complaint
3/16/2020	56	LS	10	42	28	325	0.50	0.50		162.50		Review of Documents in File
3/16/2020	56	LS	10	16	29	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM

Date	Tkpr	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
3/16/2020	56 LS	10	53	30	325	0.40	0.40		130.00		Review of correspondence Defendant's Motion to Dismiss
3/17/2020	56 LS	10	316	31	325	0.20	0.20		65.00		E-mails to and from Client regarding status
3/17/2020	56 LS	10	16	32	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
3/17/2020	56 LS	10	16	33	325	0.10	0.10		32.50		Internal collaboration re strategy with local counsel
4/3/2020	56 LS	10	53	36	325	0.40	0.40		130.00		Review of correspondence Defendant's Second Motion to Dismiss
4/3/2020	56 LS	10	16	37	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM
4/3/2020	56 LS	10	315	38	325	0.10	0.10		32.50		Send e-mail to client
4/3/2020	56 LS	10	42	39	325	0.20	0.20		65.00		Review of Documents
4/6/2020	56 LS	10	316	40	325	0.30	0.30		97.50		E-mails to and from Client regarding amending complaint to add parent
4/6/2020	56 LS	10	43	41	325	0.50	0.50		162.50		Review & Revise Draft Amended Complaint adding parent
4/6/2020	56 LS	10	16	42	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
4/7/2020	56 LS	10	316	43	325	0.30	0.30		97.50		E-mails to and from Client regarding status
4/7/2020	56 LS	10	16	44	325	0.50	0.50		162.50		Internal collaboration re strategy with ACM
4/7/2020	56 LS	10	237	45	325	0.20	0.20		65.00		Call with/to client regarding status
4/7/2020	56 LS	10	43	46	325	0.50	0.50		162.50		Review & Revise draft complaint in MDPA
4/7/2020	56 LS	10	158	47	325	0.20	0.20		65.00		Drafting correspondence to Client
4/7/2020	56 LS	10	65	48	325	0.10	0.10		32.50		Correspondence/Phone Calls Voluntary Dismissal
4/8/2020	56 LS	10	65	52	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
4/8/2020	56 LS	10	16	53	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM
4/8/2020	56 LS	10	43	54	325	0.50	0.50		162.50		Review & Revise Complaint
4/8/2020	56 LS	10	43	55	325	0.20	0.20		65.00		Review & Revise Stipulation
4/8/2020	56 LS	10	65	56	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
4/8/2020	56 LS	10	16	57	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM
4/14/2020	56 LS	10	65	50	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
4/14/2020	56 LS	10	42	51	325	0.20	0.20		65.00		Review of Documents
4/16/2020	56 LS	10	16	60	325	0.30	0.30		97.50		Internal collaboration re strategy e-mails with ACM and Local Counsel
4/20/2020	56 LS	10	42	61	325	0.50	0.50		162.50		Review of Documents Motion to Seal
4/20/2020	56 LS	10	11	62	325	0.50	0.50		162.50		Research Local Rules MDPA
4/21/2020	56 LS	10	65	63	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Opposing Counsel regarding check

Date	Tkpr	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
4/21/2020	56 LS	10	16	64	325	0.10	0.10		32.50		Internal collaboration re strategy e-mail with ACM
4/21/2020	56 LS	10	316	65	325	0.20	0.20		65.00		E-mails to and from Client regarding status
5/11/2020	56 LS	10	316	66	325	0.20	0.20		65.00		E-mails to and from Client regarding status
5/13/2020	56 LS	10	65	67	325	0.20	0.20		65.00		Correspondence/Phone Calls e-mails with Defense Counsel
5/13/2020	56 LS	10	42	68	325	0.10	0.10		32.50		Review of Documents
5/15/2020	56 LS	10	42	69	325	0.20	0.20		65.00		Review of Documents Filed
5/15/2020	56 LS	10	65	70	325	0.40	0.40		130.00		Correspondence/Phone Calls e-mails with Defendant's Counsel
5/18/2020	56 LS	10	65	72	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mails with Defendant's Counsel
5/19/2020	56 LS	10	316	73	325	0.20	0.20		65.00		E-mails to and from Client regarding status
7/7/2020	56 LS	10	316	74	325	0.00	0.00		0.10	0.10	E-mails to and from Client regarding status
7/8/2020	56 LS	10	16	75	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
7/8/2020	56 LS	10	65	76	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mails with Opposing Counsel
7/14/2020	56 LS	10	16	77	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
7/15/2020	56 LS	10	65	78	325	0.10	0.10		32.50		Correspondence/Phone Calls E-mail Defense Counsel
7/15/2020	56 LS	10	16	79	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
7/15/2020	56 LS	10	53	80	325	0.20	0.20		65.00		Review of correspondence Answer
7/22/2020	56 LS	10	316	81	325	0.10	0.10		32.50		E-mails to and from Client regarding status
8/7/2020	56 LS	10	65	82	325	0.20	0.20		65.00		Correspondence/Phone Calls with Defense Counsel
8/10/2020	56 LS	10	16	83	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
8/11/2020	56 LS	10	65	84	325	0.40	0.40		130.00		Correspondence/Phone Calls Conference Call with Defense Counsel and Clerk
8/11/2020	56 LS	10	11	85	325	0.30	0.30		97.50		Research Local Rules
8/12/2020	56 LS	10	11	86	325	0.30	0.30		97.50		Research Causes of Action in PA
8/12/2020	56 LS	10	16	87	325	0.20	0.20		65.00		Internal collaboration re strategy with JPR
8/13/2020	56 LS	10	65	88	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Defense Counsel
9/14/2020	56 LS	10	42	90	325	0.20	0.20		65.00		Review of Documents Local Rules
9/14/2020	56 LS	10	48	91	325	0.50	0.50		162.50		Drafting-Motion to Unseal
9/14/2020	56 LS	10	65	92	325	0.10	0.10		32.50		Correspondence/Phone Calls E-mail with Defendant's Counsel
9/15/2020	56 LS	10	316	94	325	0.10	0.10		32.50		E-mails to and from Client regarding status
9/21/2020	56 LS	10	65	95	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Defendant Counsel
9/22/2020	56 LS	10	65	96	325	0.30	0.30		97.50		Correspondence/Phone Calls with Defense Counsel

Date	Tkpr	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
9/22/2020	56	LS	10	42	97	325	0.10	0.10	32.50		Review of Documents Docket
9/22/2020	56	LS	10	43	98	325	0.20	0.20	65.00		Review & Revise Motion to Unseal
9/22/2020	56	LS	10	53	99	325	0.10	0.10	32.50		Review of correspondence Court Notice
9/22/2020	56	LS	10	315	100	325	0.10	0.10	32.50		Send e-mail to client
9/30/2020	56	LS	10	65	93	325	0.20	0.20	65.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
10/6/2020	56	LS	10	65	101	325	0.10	0.10	32.50		Correspondence/Phone Calls E-mail with Defense Counsel
10/6/2020	56	LS	10	16	102	325	0.10	0.10	32.50		Internal collaboration re strategy with ACM
10/7/2020	56	LS	10	65	103	325	0.20	0.20	65.00		Correspondence/Phone Calls with Defendant's Counsel
10/7/2020	56	LS	10	65	104	325	0.10	0.10	32.50		Correspondence/Phone Calls to Clerk with Defendant's Counsel
10/16/2020	56	LS	10	11	105	325	0.20	0.20	65.00		Research Local Rules
10/16/2020	56	LS	10	65	106	325	1.00	1.00	325.00		Correspondence/Phone Calls Joint Scheduling Order
10/16/2020	56	LS	10	158	107	325	0.10	0.10	32.50		Drafting correspondence to Court
10/16/2020	56	LS	10	65	108	325	0.10	0.10	32.50		Correspondence/Phone Calls E-mail to Defendant's Counsel
10/16/2020	56	LS	10	65	109	325	0.10	0.10	32.50		Correspondence/Phone Calls e-mail with Defendant's Counsel
10/20/2020	56	LS	10	65	110	325	0.20	0.20	65.00		Correspondence/Phone Calls and E-mail with Defendant's Counsel
10/20/2020	56	LS	10	43	111	325	0.30	0.30	97.50		Review & Revise Case Management Plan
10/20/2020	56	LS	10	11	112	325	0.20	0.20	65.00		Research Local Rules and ERISA Practice
10/28/2020	56	LS	10	65	113	325	0.20	0.20	65.00		Correspondence/Phone Calls E-mail with Defendant
10/28/2020	56	LS	10	43	114	325	0.10	0.10	32.50		Review & Revise Joint Case Management Report
11/3/2020	56	LS	10	42	115	325	0.10	0.10	32.50		Review of Documents Court Notice
11/3/2020	56	LS	10	158	116	325	0.20	0.20	65.00		Drafting correspondence Letter to Court and Counsel
11/12/2020	56	LS	10	16	117	325	0.10	0.10	32.50		Internal collaboration re strategy with ACM
11/30/2020	56	LS	10	65	118	325	0.10	0.10	32.50		Correspondence/Phone Calls E-mail Defendant's Counsel
11/30/2020	56	LS	10	42	119	325	0.20	0.20	65.00		Review of Documents Joint Motion and Protective Order
12/1/2020	56	LS	10	65	120	325	0.10	0.10	32.50		Correspondence/Phone Calls E-mail with Defense Counsel
12/2/2020	56	LS	10	65	121	325	0.10	0.10	32.50		Correspondence/Phone Calls E-mail with Defendant's Counsel
12/28/2020	56	LS	10	65	122	325	0.10	0.10	32.50		Correspondence/Phone Calls E-mail with Defense Counsel

Date	Tkpr	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
1/4/2021	56 LS	10	65	123	325	0.20	0.20		65.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
1/4/2021	56 LS	10	43	124	325	0.30	0.30		97.50		Review & Revise Admin Record from Defense Counsel
1/8/2021	56 LS	10	16	125	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
2/5/2021	56 LS	10	16	126	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM
3/12/2021	56 LS	10	42	127	330	0.20	0.20		66.00		Review of Documents File
3/12/2021	56 LS	10	11	128	330	0.50	0.50		165.00		Research MDPA Local Rules
3/15/2021	56 LS	10	42	129	330	2.50	2.50		825.00		Review of Documents Administrative Record
3/16/2021	56 LS	10	42	130	330	2.00	2.00		660.00		Review of Documents Administrative Record
3/16/2021	56 LS	10	18	131	330	1.00	1.00		330.00		Drafting-Brief Statement of Facts
3/17/2021	56 LS	10	42	132	330	2.00	2.00		660.00		Review of Documents Administrative Record
3/17/2021	56 LS	10	18	133	330	1.00	1.00		330.00		Drafting-Brief Statement of Facts
3/18/2021	56 LS	10	11	134	330	1.50	1.50		495.00		Research Case Law
3/18/2021	56 LS	10	42	135	330	2.00	2.00		660.00		Review of Documents Administrative Record
3/18/2021	56 LS	10	18	136	330	2.00	2.00		660.00		Drafting-Brief Statement of Facts and Brief
3/19/2021	56 LS	10	18	137	330	3.00	3.00		990.00		Drafting-Brief Summary Judgment Brief
3/22/2021	56 LS	10	18	138	330	2.00	2.00		660.00		Drafting-Brief Summary Judgment Brief
3/23/2021	56 LS	10	11	139	330	1.50	1.50		495.00		Research Case Law
3/23/2021	56 LS	10	18	140	330	3.00	3.00		990.00		Drafting-Brief Summary Judgment Brief
3/24/2021	56 LS	10	43	141	330	2.00	2.00		660.00		Review & Revise Prepare Brief for Filing
3/25/2021	56 LS	10	236	142	330	0.20	0.20		66.00		Call with/to opposing counsel with Opposing Counsel
3/25/2021	56 LS	10	16	143	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM
3/25/2021	56 LS	10	65	144	330	0.20	0.20		66.00		Correspondence/Phone Calls Local Rules
3/25/2021	56 LS	10	18	145	330	0.20	0.20		66.00		Drafting-Brief Motion to file overlength brief
3/25/2021	56 LS	10	11	146	330	0.20	0.20		66.00		Research local rules
3/26/2021	56 LS	10	65	147	330	0.20	0.20		66.00		Correspondence/Phone Calls, email with def's counsel
3/26/2021	56 LS	10	18	148	330	0.50	0.50		165.00		Drafting-Brief. Motion to file overlength brief
4/14/2021	56 LS	10	65	149	330	0.20	0.20		66.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
4/14/2021	56 LS	10	42	150	330	0.20	0.20		66.00		Review of Documents Docket
4/20/2021	56 LS	10	42	151	330	0.10	0.10		33.00		Review of Documents Order
4/29/2021	56 LS	10	65	152	330	0.10	0.10		33.00		Correspondence/Phone Calls E-mail with Defendant's Counsel
4/30/2021	56 LS	10	65	153	330	0.10	0.10		33.00		Correspondence/Phone Calls E-Mail with Defendant's Counsel
5/6/2021	56 LS	10	65	154	330	0.10	0.10		33.00		Correspondence/Phone Calls. E-mail with defendant's counsel

Date	Tkpr		Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
5/6/2021	56	LS	10	53	155	330	0.20	0.20		66.00		Review of correspondence. Defendant's cross motion for summary judgment.
5/13/2021	56	LS	10	42	167	330	1.00	1.00		330.00		Review of Documents Defendant's Motion for Summary Judgment
5/13/2021	56	LS	10	16	168	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM
5/14/2021	56	LS	10	65	169	330	0.10	0.10		33.00		Correspondence/Phone Calls to KKI
5/17/2021	56	LS	10	237	170	330	0.20	0.20		66.00		Call with/to client Call to KKI
5/24/2021	56	LS	10	316	156	330	0.30	0.30		99.00		E-mails to and from Client.
5/24/2021	56	LS	10	16	157	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM
5/25/2021	56	LS	10	11	158	330	2.00	2.00		660.00		Research Case Law Cited By Defendant
5/25/2021	56	LS	10	18	159	330	2.00	2.00		660.00		Drafting-Brief Opposition to Summary Judgment
5/26/2021	56	LS	10	316	160	330	0.20	0.20		66.00		E-mails to and from Client.
5/26/2021	56	LS	10	42	161	330	0.30	0.30		99.00		Review of Documents Information From Client
5/26/2021	56	LS	10	18	162	330	3.00	3.00		990.00		Drafting-Brief Opposition
5/27/2021	56	LS	10	18	163	330	4.00	4.00		1320.00		Drafting-Brief Response, Opposition Brief
5/27/2021	56	LS	10	11	164	330	1.50	1.50		495.00		Research Case Law
5/27/2021	56	LS	10	42	165	330	1.00	1.00		330.00		Review of Documents Records
5/28/2021	56	LS	10	18	166	330	1.00	1.00		330.00		Drafting-Brief Response, Opposition Brief
6/1/2021	56	LS	10	18	173	330	1.80	1.80		594.00		Drafting-Brief Opposition Brief
6/1/2021	56	LS	10	11	174	330	0.60	0.60		198.00		Research Case Law Cited by Defendant
6/1/2021	56	LS	10	16	175	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM
6/2/2021	56	LS	10	43	172	330	1.30	1.30		429.00		Review & Revise Prepare Brief for filing
6/28/2021	56	LS	10	65	176	330	0.10	0.10		33.00		Correspondence/Phone Calls. w/ def's counsel
6/30/2021	56	LS	10	65	177	330	0.10	0.10		33.00		Correspondence/Phone Calls. Email from def's counsel
6/30/2021	56	LS	10	53	178	330	0.20	0.20		66.00		Review of correspondence. Defendant's reply brief.
8/4/2021	56	LS	10	65	180	330	0.30	0.30		99.00		Correspondence/Phone Calls. Notice of Supplemental Authority
8/4/2021	56	LS	10	16	181	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM
8/4/2021	56	LS	10	11	182	330	0.20	0.20		66.00		Research local rules
8/12/2021	56	LS	10	53	183	330	0.10	0.10		33.00		Review of correspondence respond by defendant
8/12/2021	56	LS	10	315	184	330	0.10	0.10		33.00		Send e-mail to client
11/7/2022	56	LS	10	65	185	350	0.10	0.10		35.00		Correspondence/Phone Calls to Court regarding status
11/7/2022	56	LS	10	16	186	350	0.10	0.10		35.00		Internal collaboration re strategy with ACM
4/3/2023	56	LS	10	65	187	370	0.10	0.10		37.00		Call court re: status
4/10/2023	56	LS	10	65	188	370	0.20	0.20		74.00		Call to Clerk
4/10/2023	56	LS	10	16	189	370	0.10	0.10		37.00		Internal collaboration re strategy ACM
4/10/2023	56	LS	10	42	190	370	0.10	0.10		37.00		Review of Docket
12/18/2023	56	LS	10	65	191	370	0.10	0.10		37.00		Correspondence/Phone Calls to Court

Date	Tkpr	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description
4/10/2024	56 LS	10	316	224	385	0.10	0.10		38.50		E-mails to and from Client re: status
4/10/2024	56 LS	10	16	225	385	0.10	0.10		38.50		Internal collaboration re strategy with ACM re: Opinion
4/15/2024	56 LS	10	65	226	385	0.10	0.10		38.50		Emails with def. counsel
4/15/2024	56 LS	10	16	227	385	0.10	0.10		38.50		Internal collaboration re strategy with ACM
4/17/2024	56 LS	10	316	233	385	0.10	0.10		38.50		E-mails to and from Client re: additional records
4/17/2024	56 LS	10	65	234	385	0.10	0.10		38.50		Call with defendants counsel
4/19/2024	56 LS	10	316	235	385	0.10	0.10		38.50		E-mails to and from Client.
4/19/2024	56 LS	10	65	236	385	0.10	0.10		38.50		Emails with defendants counsel
4/24/2024	56 LS	10	48	228	385	0.60	0.60		231.00		Drafting-Motion for Attorney's Fees
4/24/2024	56 LS	10	16	229	385	0.20	0.20		77.00		Internal collaboration re strategy with ACM
4/24/2024	56 LS	10	42	230	385	0.20	0.20		77.00		Review of Documents
4/24/2024	56 LS	10	65	231	385	0.10	0.10		38.50		Email with defendant's counsel
4/24/2024	56 LS	10	11	232	385	1.00	1.00		385.00		Research law on fee petition
4/25/2024	56 LS	10	11	237	385	1.50	1.50		577.50		Research rules/case law re: motion for fees
4/26/2024	56 LS	10	48	238	385	0.20	0.20		77.00		Drafting-Motion for Fees
4/26/2024	56 LS	10	18	239	385	1.00	1.00		385.00		Drafting-Brief in Support of Motion for Fees
4/27/2024	56 LS	10	18	240	385	1.50	1.50		577.50		Drafting-Brief in Support of Motion for Fees
4/27/2024	56 LS	10	16	241	385	0.20	0.20		77.00		Internal collaboration re strategy with ACM
4/28/2024	56 LS	10	16	242	385	0.10	0.10		38.50		Internal collaboration re strategy with ACM
Billable Total:			56 Leily Schoenhaus			87.8	87.8	0	29,112.10	0.10	

EXHIBIT B

Date	Tkpr	Name	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description	Anthem's Objection (By Category)
11/18/2019	19	ACM	10	16	219	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.	Vague; internal collaboration.
12/9/2019	19	ACM	10	16	192	605	0.20	0.20		121.00		Internal collaboration re strategy with LS.	Vague; internal collaboration.
3/16/2020	19	ACM	10	16	193	605	0.20	0.20		121.00		Internal collaboration re strategy with LS.	Vague; internal collaboration.
3/17/2020	19	ACM	10	16	194	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
3/20/2020	19	ACM	10	13	34	535	3.50	3.50		1872.50		Review documents and Amended Complaint.	Vague; block-billed.
3/20/2020	19	ACM	10	13	35	535	3.50	3.50		1872.50		Review documents and Amended Complaint.	Vague; block-billed.
4/3/2020	19	ACM	10	16	195	605	0.20	0.20		121.00		Internal collaboration re strategy with LS.	Vague; internal collaboration.
4/6/2020	19	ACM	10	16	217	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily S.	Vague; internal collaboration.
4/7/2020	19	ACM	10	16	218	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily S.	Vague; internal collaboration.
4/8/2020	19	ACM	10	16	196	605	0.20	0.20		121.00		Internal collaboration re strategy with LS.	Vague; internal collaboration.
4/8/2020	19	ACM	10	16	197	605	0.20	0.20		121.00		Internal collaboration re strategy with LS.	Vague; internal collaboration.
4/13/2020	19	ACM	10	13	59	535	3.50	3.50		1872.50		Review documents.	Vague.
4/16/2020	19	ACM	10	16	198	605	0.30	0.30		181.50		Internal collaboration re strategy. Emails with LS and local counsel.	Vague; internal collaboration; block-billed; local counsel/unnecessary.
4/21/2020	19	ACM	10	16	199	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
5/1/2020	19	ACM	10	13	71	535	3.50	3.50		1872.50		Draft Complaint. Correspondence with court.	Block-billed.
7/5/2020	19	ACM	10	16	201	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
7/14/2020	19	ACM	10	16	200	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
8/10/2020	19	ACM	10	16	202	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
10/6/2020	19	ACM	10	16	203	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
10/28/2020	19	ACM	10	13	223	605	0.30	0.30		181.50		Review Joint Case Management Report. Internal collaboration with LS.	Vague; internal collaboration; block-billed.
11/12/2020	19	ACM	10	16	204	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
1/8/2021	19	ACM	10	16	206	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
2/5/2021	19	ACM	10	16	207	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
3/25/2021	19	ACM	10	16	205	605	0.10	0.10		60.50		Internal collaboration re strategy with LS.	Vague; internal collaboration.
5/13/2021	19	ACM	10	16	211	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.	Vague; internal collaboration.
5/18/2021	19	ACM	10	13	171	550	2.50	2.50		1375.00		Review pleadings.	Vague.
5/24/2021	19	ACM	10	16	212	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.	Vague; internal collaboration.
6/1/2021	19	ACM	10	16	213	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.	Vague; internal collaboration.
8/4/2021	19	ACM	10	16	214	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.	Vague; internal collaboration.
1/7/2022	19	ACM	10	16	215	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily S.	Vague; internal collaboration.
4/10/2022	19	ACM	10	16	216	605	0.10	0.10		60.50		Internal collaboration re strategy with Leily.	Vague; internal collaboration.
11/18/2019	56	LS	10	65	18	305	0.10	0.10		30.50		Correspondence/Phone Calls with Local Counsel	Vague; local counsel/unnecessary.
11/18/2019	56	LS	10	16	19	305	0.10	0.10		30.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
11/27/2019	56	LS	10	42	1	305	1.00	1.00		305.00		Review of Documents from client	Vague.
12/4/2019	56	LS	10	42	2	305	1.00	1.00		305.00		Review of Documents	Vague.
12/5/2019	56	LS	10	42	6	305	0.10	0.10		30.50		Review of Documents from client	Vague.
12/9/2019	56	LS	10	16	9	305	0.20	0.20		61.00		Internal collaboration re strategy w/ACM	Vague; internal collaboration.
12/16/2019	56	LS	10	65	13	305	0.30	0.30		91.50		Correspondence/Phone Calls' e-mail w/local counsel	Vague; local counsel/unnecessary.
12/18/2019	56	LS	10	53	15	305	0.10	0.10		30.50		Review of correspondence, Settlement Denial HR	Vague.
12/30/2019	56	LS	10	65	16	305	0.10	0.10		30.50		Correspondence/Phone Calls, e-mail w/local counsel	Vague; local counsel/unnecessary.
12/30/2019	56	LS	10	65	17	305	0.10	0.10		30.50		Correspondence/Phone Calls, agmt. From local counsel	Vague; local counsel/unnecessary.
1/15/2020	56	LS	10	65	20	305	0.10	0.10		30.50		Correspondence/Phone Calls, e-mail w/local counsel re: status	Vague; local counsel/unnecessary.
1/21/2020	56	LS	10	65	21	305	0.10	0.10		30.50		Correspondence/Phone Calls, e-mail w/local counsel	Vague; local counsel/unnecessary.
2/5/2020	56	LS	10	65	23	325	0.20	0.20		65.00		Correspondence/Phone Calls, e-mail w/local counsel	Vague; local counsel/unnecessary.
3/16/2020	56	LS	10	42	28	325	0.50	0.50		162.50		Review of Documents in File	Vague.
3/16/2020	56	LS	10	16	29	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
3/17/2020	56	LS	10	16	32	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
3/17/2020	56	LS	10	16	33	325	0.10	0.10		32.50		Internal collaboration re strategy with local counsel	Vague; internal collaboration; local counsel/unnecessary.
4/3/2020	56	LS	10	16	37	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/3/2020	56	LS	10	42	39	325	0.20	0.20		65.00		Review of Documents	Vague.
4/6/2020	56	LS	10	16	42	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.

Date	Tkpr	Name	Cat	Tcode	Ref #	Rate	Hours Worked	Hours to Bill	Write-Up / Down Hrs	Amount	Write-Up / Down Amt	Description	Anthem's Objection (By Category)
4/7/2020	56	LS	10	16	44	325	0.50	0.50		162.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/8/2020	56	LS	10	16	53	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/8/2020	56	LS	10	16	57	325	0.20	0.20		65.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/14/2020	56	LS	10	42	51	325	0.20	0.20		65.00		Review of Documents	Vague.
4/16/2020	56	LS	10	16	60	325	0.30	0.30		97.50		Internal collaboration re strategy e-mails with ACM and Local Counsel	Vague; internal collaboration; local counsel/unnecessary.
4/21/2020	56	LS	10	16	64	325	0.10	0.10		32.50		Internal collaboration re strategy e-mail with ACM	Vague; internal collaboration.
5/13/2020	56	LS	10	42	68	325	0.10	0.10		32.50		Review of Documents	Vague.
5/15/2020	56	LS	10	42	69	325	0.20	0.20		65.00		Review of Documents Filed	Vague.
7/8/2020	56	LS	10	16	75	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
7/14/2020	56	LS	10	16	77	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
7/15/2020	56	LS	10	16	79	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
8/10/2020	56	LS	10	16	83	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
8/12/2020	56	LS	10	16	87	325	0.20	0.20		65.00		Internal collaboration re strategy with JPR	Vague; internal collaboration.
9/22/2020	56	LS	10	42	97	325	0.10	0.10		32.50		Review of Documents Docket	Vague.
10/6/2020	56	LS	10	16	102	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
11/12/2020	56	LS	10	16	117	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
1/8/2021	56	LS	10	16	125	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
2/5/2021	56	LS	10	16	126	325	0.10	0.10		32.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
3/12/2021	56	LS	10	42	127	330	0.20	0.20		66.00		Review of Documents File	Vague.
3/25/2021	56	LS	10	16	143	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/14/2021	56	LS	10	42	150	330	0.20	0.20		66.00		Review of Documents Docket	Vague.
4/20/2021	56	LS	10	42	151	330	0.10	0.10		33.00		Review of Documents Order	Vague.
5/13/2021	56	LS	10	16	168	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
5/24/2021	56	LS	10	16	157	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
5/26/2021	56	LS	10	42	161	330	0.30	0.30		99.00		Review of Documents Information From Client	Vague.
5/27/2021	56	LS	10	42	165	330	1.00	1.00		330.00		Review of Documents Records	Vague.
6/1/2021	56	LS	10	16	175	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
8/4/2021	56	LS	10	16	181	330	0.10	0.10		33.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
11/7/2022	56	LS	10	65	185	350	0.10	0.10		35.00		Correspondence/Phone Calls to Court regarding status	Vague.
11/7/2022	56	LS	10	16	186	350	0.10	0.10		35.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/3/2023	56	LS	10	65	187	370	0.10	0.10		37.00		Call court re: status	Vague.
4/10/2023	56	LS	10	65	188	370	0.20	0.20		74.00		Call to Clerk	Vague.
4/10/2023	56	LS	10	16	189	370	0.10	0.10		37.00		Internal collaboration re strategy ACM	Vague; internal collaboration.
4/10/2023	56	LS	10	42	190	370	0.10	0.10		37.00		Review of Docket	Vague.
12/18/2023	56	LS	10	65	191	370	0.10	0.10		37.00		Correspondence/Phone Calls to Court	Vague.
4/10/2024	56	LS	10	16	225	385	0.10	0.10		38.50		Internal collaboration re strategy with ACM re: Opinion	Vague; internal collaboration.
4/15/2024	56	LS	10	16	227	385	0.10	0.10		38.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/24/2024	56	LS	10	16	229	385	0.20	0.20		77.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/24/2024	56	LS	10	42	230	385	0.20	0.20		77.00		Review of Documents	Vague.
4/27/2024	56	LS	10	16	241	385	0.20	0.20		77.00		Internal collaboration re strategy with ACM	Vague; internal collaboration.
4/28/2024	56	LS	10	16	242	385	0.10	0.10		38.50		Internal collaboration re strategy with ACM	Vague; internal collaboration.
									Total of Column K	\$ 14,849.00			